

**AFFIDAVIT**

BEFORE ME, the undersigned authority, personally came and appeared:

**Douglas Handshoe,**

who, after being duly sworn according to law, did make the following statements of his own personal knowledge, information and belief:

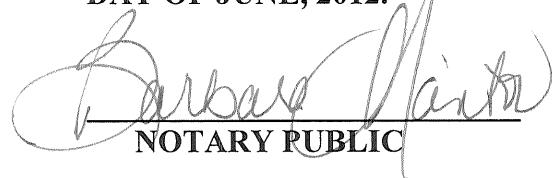
1. He is the owner of Slabbed New Media, LLC, and the Internet website and blog, Slabbed.org.
2. He reports on issues including but not limited to ongoing civil and criminal court cases, Hurricanes Katrina and Rita, the Gulf Oil Spill, and political corruption on the Slabbed blog.
3. He has never subjected conducted any business in Canada, never travelled to Canada nor done anything which might subject him to personal jurisdiction in Canada. He does not have minimum contacts with Canada. He is a resident of Mississippi and the principal place of business of Slabbed is Mississippi.
4. He did not defend himself in the Nova Scotia proceeding on February 1, 2012, nor has he ever defended himself in any Canadian proceedings.
5. His blog is not targeted to a readership in Canada. It is directed to readers in the Gulf South, as evident by the slogan of the blog: "Alternative New Media for the Gulf South."
6. All of the statements on his blog regarding plaintiffs are either true or widely reported allegations of fact from other media.
7. Plaintiffs are public figures because of their association with former Jefferson Parish President Aaron Broussard, as well as their prior failed business venture in Canada,

unethical business practices with Canadian milk producers, and the lawsuit filed against them by the Atlantic Canadian Opportunities Agency. They are therefore required to prove actual malice in a defamation lawsuit.

8. An article ran in the March 2002 issue of *Rural Delivery Magazine* revealing plaintiffs' unethical business practices with Canadian milk producers.
9. Defendant has never used "fighting words" (words that are inherently likely to provoke violent reaction and are not protected by the First Amendment), nor has he threatened plaintiffs.
10. Plaintiffs are engaged in a homosexual relationship that was not secret prior to defendant's discussion on the blog.
11. Plaintiffs utilized the Canadian injunctive order in the United States to persuade Slabbed's internet service providers to cease services to Slabbed.

  
DOUGLAS HANDSHOE

SWORN TO & SUBSCRIBED  
BEFORE ME, THIS 26<sup>th</sup>  
DAY OF JUNE, 2012.

  
NOTARY PUBLIC

BARBARA MANTON  
NOTARY PUBLIC  
STATE OF LOUISIANA  
ID # 80490  
COMMISSIONED FOR LIFE